

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION
Civil Action No. 7:08-CV-129

MARIANNE R. TALBOT for R.T., infant,

and

MARIANNE R. TALBOT, Individually

Plaintiff,

vs.

KOHL'S DEPARTMENT STORES, INC., and
KOHL'S CORPORATION,

Defendants.

KOHL'S CORPORATION'S
MOTION FOR EXTENSION OF TIME TO
RESPOND TO PLAINTIFFS' FIRST SET
OF INTERROGATORIES AND FIRST
REQUEST FOR PRODUCTION OF
DOCUMENTS

Defendant, Kohl's Corporation ("Kohl's"), through undersigned counsel, files this Motion for Extension of Time to Respond to Plaintiffs' First Set of Interrogatories and First Request for Production of Documents, pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and Local Civil Rule 6.1, Eastern District of North Carolina, to enlarge the period in which Kohl's may answer or otherwise respond to Plaintiffs' First Set of Interrogatories and First Request for Production of Documents up to and including March 31, 2009. As grounds for this extension, Kohl's shows the Court that:

1. Plaintiffs served their First Set of Interrogatories and First Request for Production of Documents to Kohl's by mail on January 29, 2009;

2. The time to answer or otherwise respond to Plaintiffs' First Set of Interrogatories and First Request for Production of Documents has not yet expired;

4. Kohl's counsel needs additional time to complete the investigation necessary to properly respond to Plaintiffs' First Set of Interrogatories and First Request for Production of Documents; and

5. Plaintiffs' counsel has been consulted and agrees to a thirty day extension of time.

WHEREFORE, Defendant Kohl's Corporation respectfully requests an Order granting Kohl's Corporation an extension of time to serve its response to Plaintiffs' First Set of Interrogatories and First Request for Production of Documents up to and including March 31, 2009.

Respectfully submitted, this the 25th day of February, 2009.

SONNENSCHN NATH & ROSENTHAL LLP

/s/ Evan M. Sauda

C. Marshall Lindsay (N.C.S.B. No. 25686)

Evan M. Sauda (N.C.S.B. No. 32915)

2100 Rexford Road, Suite 100

Charlotte, NC 28211-3484

Telephone 704 972-9000

Facsimile 704 972-9010

Attorneys for Kohl's Corporation

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing pleading has been served upon all parties through the Court's CM/ECF System this 25th day of February, 2009.

SONNENSCHN NATH & ROSENTHAL LLP

By: /s/ Evan M. Sauda
Evan M. Sauda
Attorney for Kohl's Corporation

Served by the CM/ECF System:

David Paul Ennis
dave@ennislawfirm.com

Attorney for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION
Civil Action No. 7:08-CV-129

MARIANNE R. TALBOT for R.T, infant,

and

MARIANNE R. TALBOT, Individually,

Plaintiffs,

vs.

KOHL'S DEPARTMENT STORES, INC.,

and

KOHL'S CORPORATION,

Defendants.

ORDER

THIS CAUSE coming on to be heard on motion of Defendant Kohl's Corporation ("Kohl's"), for an enlargement of time to respond to Plaintiffs' First Set of Interrogatories and First Request for Production of Documents, with the consent of Plaintiffs' Counsel, and for good cause having been shown that an extension of time is necessary to answer or otherwise respond.

IT IS THEREFORE ORDERED that the time for Kohl's to serve its response to Plaintiffs' First Set of Interrogatories and First Request for Production is hereby enlarged up to and including March 31, 2009.